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ABSTRACT

Intended to raise race and sex compliance issues to be addressed by the National Institute of Education (NIE) in its congressionally mandated study of vocational education, this paper defines Title VI (Civil Rights Act of 1964) and Title IX (Education Amendments of 1972) compliance issues regarding the level of minority (black Americans) and women student and staff participation in vocational schools. An introductory section briefly reviews the history of Federal vocational legislation with reference to equality of opportunity. In Section I the three barriers that black and female students encounter to their attending the best vocational schools are discussed: geographical location of schools, segregation within school districts, and admission criteria. Section II suggests the need for more evidence to document discrimination in federal and state funding of vocational education. Section III examines to what extent vocational training perpetuates, and how counselors contribute to, sexual and racial stratification in the labor market. While Sections IV and V compare the number of blacks and women who participate in work-study, cooperative education, and apprenticeship programs to their number enrolled in vocational schools, Section VI explores their underrepresentation as teachers in these schools. The recommendations in Section VII for vocational school research by NIE focus on the five areas of finance, construction, governance structure, cooperative education and work study, and admission criteria. (EG)

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RACE AND SEX COMPLIANCE ISSUES

IN

VOCATIONAL EDUCATION

by

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INTRODUCTION

The year 1977 marks the 60th anniversary of federal financial assistance to vocational education. Its inception was the Smith-Hughes Act of 1917 which provided for the promotion of vocational preparation at the secondary level in agriculture, home economics, and trades and industries, as well as the preparation of teachers in these subjects. The Act established a Federal Board of Vocational Education and required states to designate a state board which would submit plans in conformance with standards imposed by the Federal Board. Federal funds were appropriated for the three different subjects. Expenditures for vocational agriculture were distributed on the basis of the states' rural population; funds for trades and industries and home economics were based on the urban population; and teacher training money was distributed on the basis of the total population.

Between World War I and World War II, Congress passed three supplementary vocational education acts[1] which increased the federal contribution, extended federally subsidized vocational education to U.S. Territories, Alaska, and the District of Columbia, and enlarged the program to include distributive occupations. In the 17 Southern and Border states that operated separate schools for blacks and whites, racially separate vocational programs were maintained. Then in the 1960's federal support for vocational education was substantially

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1/ The George-Reed Act of 1929, the George-Ellzey Act of 1934, the George-Deen Act of 1936.

expanded and modernized to respond to the economic, technological and demographic changes that had swept post-war America. The high level of unemployment, especially among young people and minorities, was a principal motivating factor behind the new concepts embodied in the Vocational Education Act of 1963. That law redirected vocational education away from training in a few selected occupational categories to an emphasis on preparing both secondary and postsecondary students for their place in the world of work, regardless of occupation. Federal law for the first time recognized that the special needs of some students - those with academic, socioeconomic or other handicaps - prevented them from succeeding in regular vocational education programs. In another radical departure from the old legislation, the 1963 Act authorized federal funds for the construction of area vocational schools, various ancillary services and activities, research, work-study programs, and the construction and operation of residential vocational schools.

The 1968 amendments built upon and reinforced the new directions of the Vocational Education Act of 1963. Eight years later, Congress again enacted significant amendments to federal vocational education legislation. The 1976 law requires states to give priority in the distribution of federal funds to economically depressed areas with high rates of unemployment and to programs which are designed to meet new and emerging manpower needs and job opportunities. The Vocational Education Amendments of 1976 recognized for the first time the pervasive sex discrimination in vocational education and made numerous mandatory provisions for eliminating sex bias and sex stereotyping in all federally assisted vocational education.

It is interesting to reflect upon these 60 years of federal support for vocational education because while the legislation has changed dramatically, vocational training for minorities and women has changed little. Vocational education, historically and presently, reinforces and perpetuates not only the prevailing stereotypes as to the socially acceptable occupations for women and minorities, but also the race and sex discrimination in the labor market fostered by employer and union practices. Jobs for which women and minorities are trained in vocational schools are still the lowest paid, the most menial, the least skilled, and the most restrictive of upward employment mobility. What is worse, a quarter of all secondary vocational students are being trained as homemakers which provides no skills for gainful employment.2/ If students in vocational guidance and industrial arts are included, somewhat more than a quarter of all secondary vocational school students are not being taught employable skills.

Vocational schools prepare minorities and women for their place in the economic and social order. That this is so as much in the 1970's as it was in the last century is discussed here and elsewhere in this paper. Vocational training has historically been an acceptable form of education for blacks. Not only did it seem to be the training best suited to fitting the occupational possibilities of slaves freed immediately after the Civil War, but it was also less expensive. Agricultural and vocational training offered at Tuskegee and Hampton

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2/ Department of Health, Education and Welfare/Office of Education, Vocational Education: Characteristics of Students and Staff, Table II-1, p.7 (1972). Hereinafter referred to as Characteristics.

Institutes enabled students to contribute to their own maintenance as well as to the support of their school by the construction of many of its buildings. After the Industrial Revolution came to the Old Confederacy, Negroes skilled in the old handicrafts--carpenters, masons, blacksmiths, and shoemakers--were no longer in demand. Skilled jobs were reserved for whites. Negro schools prepared girls for domestic service and trained boys in the rapidly disappearing handicrafts. Negro postsecondary institutions, such as Hampton and Tuskegee, existed almost solely for the purpose of training teachers for the lower schools rather than for the demands of modern industry. 3/

In the 60 years of federal vocational education legislation, the federal government has subsidized vocational education programs which have limited the access of blacks to the full range of available training opportunities. In the 1934-35 school year under the Smith-Hughes Act, there were 260,826 students enrolled in federally assisted vocational courses in the states that maintained racially separate schools. Although Negroes constituted 21% of the population of these states, they accounted for only 16% of the vocational course enrollment and received only 10% of the funds. White pupils were evenly divided among the three types of programs: 36% in agriculture, 34% in home economics, and 30% in trade and industry. But the distribution of Negro pupils was much different: 55% were enrolled in vocational agriculture, 29% in home economics, and 16% in trade and industry. 4/ In none of the three programs supported by the Smith-Hughes Act did

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3/ Gunnar Myrdal, An American Dilemma, pp. 897-900 (1964 ed.)

4/ E. Franklin Frazier, The Negro in the United States, p.438 (1949)

Negroes have access to vocational training equal to what an equitable distribution would have afforded them. This was particularly so in trade and industry. Despite discrimination against Negroes in the skilled and semi-skilled trades, the access provided Negroes in trade courses did not even approximate the proportion that Negroes were of the total number of skilled and semi-skilled workers in the states where racially dual vocational programs were maintained.5/

The distribution of federal vocational education funds was racially inequitable. Negroes received 12% of federal funds for vocational agriculture although they constituted 24% of the rural population; 9% of the expenditure for home economics although they constituted 21% of the total population; and only 5% of the money for trades and industry programs although they constituted 17% of the urban population.6/ As a consequence, the small share of federal funds which was allocated to Negro vocational training was predominantly devoted to vocational agriculture and home economics, that is farming and the domestic service occupations to which blacks have been relegated. E. Franklin Frazier charged that "[T]he United States Office of Education has been responsible for permitting the opposition of southern whites to technical training for Negroes to determine the distribution of federal funds for the vocational education of Negroes."7/

5/ Charles H. Thompson, "The Federal Program of Vocational Education in Negro Schools of Less than College Grade," Journal of Negro Education, Vol.7, p.303 (July 1938)

6/ Supra note 4 at 438-439.

7/ Ibid.

Only in relatively recent times has discrimination against minorities and women by recipients of federal financial assistance been prohibited. The same Congress that enacted the Vocational Education Act of 1963 also passed the Civil Rights Act of 1964, Title VI of which provides:

> "No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[8]

In 1972 discrimination on the grounds of sex by recipients of federal education funds became illegal. Title IX of the Education Amendments of 1972 provides:

> "No person in the United States shall on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."[9]

Responsibility for enforcing both of these statutes has been lodged with the Office for Civil Rights of the Department of Health, Education, and Welfare. Administrative enforcement of Title VI, together with judicial enforcement in suits brought by the U.S. Government and private plaintiffs, have substantially, although not completely, eliminated the de jure system of racially separate schools in the 17 Southern and Border states. Remnants of the dual system, including vocational schools, remain today. Title IX enforce-

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8/ 42 U.S.C. 2000d, Sec.601.

9/ 20 U.S.C. 1681.

ment is only in its infancy. The final implementing regulations did not become effective until July 1975, three years after Title IX was enacted.

Both Title VI and Title IX have far reaching potential for eradicating race and sex discrimination in vocational schools. All vocational schools, whether public or proprietary, are reached by federal non-discrimination statutes if they receive any type of federal subsidy. The problem is, however, that there has been virtually no enforcement of these statutes as applied to vocational education. The Office for Civil Rights (OCR) has never issued any interpretation of the basic Title VI regulations or any compliance policies which are directly applicable to vocational education. Data collection, compliance reviews, and complaint investigations in the area of vocational education have been so deficient that even the most suspect discriminatory practices have not been found to be illegal.10/

The Office for Civil Rights has developed and issued compliance policies applicable to sex discrimination in vocational schools.11/ They address specifically admission, recruitment, counseling, job placement, employment, and program segregation practices. Vocational school officials are far better advised as to what steps must be taken to comply with Title IX than they are with respect to Title VI. There are no comparable compliance policies for Title VI.

10/ Phyllis McClure, Title VI and Title IX Compliance by the Office for Civil Rights In State-Operated Special Purposes and Vocational Schools Pursuant to Adams v. Mathews, (July 1976). Hereinafter referred to as LDF Report.

11/ Office for Civil Rights, Title IX Manual, September 1975.

The lack of Title VI and Title IX enforcement, including the area of vocational education, has required private plaintiffs to initiate litigation against the Department of Health, Education and Welfare seeking to have these federal statutes enforced.12/

In the Adams v. Califano case, the District Court for the District of Columbia ordered OCR in 1973 "to implement without unreasonable delay an enforcement program adequate to secure Title VI compliance with respect to vocational and other schools administered or operated by State Departments of Education sufficient to assure their compliance with Title VI, including reporting and on-site reviews." OCR subsequently conducted a survey in 1974 of 1,507 area vocational schools. Based on 1,000 responses, OCR found that 67 schools disclosed immediate compliance problems. All but three were totally ignored. OCR's few compliance reviews and complaint investigations uncovered (1) serious disproportion of minority faculty and administrators, (2) racially and sexually identifiable vocational schools and course offerings, (3) evidence of racial gerrymandering of vocational school districts, (4) vocational school admission practices which had a racially adverse impact, (5) the almost total absence of minorities and women in apprenticeship programs conducted in vocational schools. With one exception, OCR took no steps to enforce the law. In May of 1977 plaintiffs in Adams filed a Motion for Further Relief which asserted that HEW had "contemptuously defied" the 1973 Order with respect to state-operated special-purpose and vocational schools.

12/ Adams v. Califano, C.A. No. 3095-70 (D.D.C.); Women's Equity Action League (WEAL) v. Califano, C.A. No. 74-1720 (D.D.C.)

The Office for Civil Rights is not the only part of the Department of Health, Education and Welfare which has responsibility for assuring non-discrimination in vocational education programs receiving federal financial assistance. In response to Congressional criticism of its lack of monitoring and enforcement, the Bureau of Occupational and Adult Education within the Office of Education undertook reviews in 1976 and 1977 of state vocational education departments called Management Evaluation Reviews for Compliance (MERCs). Late in the design of the MERCs, the Bureau decided to include some Title IX questions. However, the Title IX component of the MERCs is limited primarily to employment practices of state vocational education departments, although one question is directed at sexually-based admissions requirements to vocational courses. The MERCs as presently constituted do not examine the state agency's responsibility for insuring compliance with Title IX either in state-operated or locally administered vocational schools. Noticeable absent from the Bureau's MERCs are any questions related to race. No questions covering Title VI compliance are asked. The Bureau of Occupational and Adult Education is oblivious to the issue of racial discrimination in vocational education.

This paper is an attempt to outline the major Title VI and Title IX compliance issues in vocational education which must be addressed by the civil rights enforcement agency (OCR), by the program operating agency (OE/BOAE), and by the National Institute of Education's vocational education study. It does not purport to answer definitively what vocational school policies and practices do or do not

constitute a violation of Title VI or Title IX. Rather the paper's purpose is to:

1. describe what evidence exists regarding the participation, or lack thereof, of minority[13/] and women students and staff in vocational schools;
2. define the compliance issues which arise from the extent of minority and female participation in vocational education;
3. offer suggestions for research and data collection on race and sex compliance issues which ought to be addressed by the National Institute of Education in its Congressionally mandated study of vocational education programs.

13/ The term "minority" wherever used in this paper refers to black Americans, unless otherwise specified.

I. ACCESS

To what extent do minorities and women have access to vocational schools, particularly those which offer high quality, diversified programs that prepare their students for skilled and well-paid employment? The answer to that question is that most black and female students do not have equal access to the best vocational schools nor to a full range of programs. The barriers are multiple. They include the location of schools, the creation of vocational school districts, racial gerrymandering, dual attendance zones, segregated branches, program differentiation, and admissions critieria. The factors which determine what kinds of students have access to which types of schools are variously determined by financial considerations, state law or state school board policy, school district wealth, local school board or administrative decisions, and educational practices. When any one or combination of these factors has the effect of adversely limiting access to black or female students, the result is a denial of equal educational opportunity.

A. Geographic Location Of Schools and Districts - One of the more common barriers preventing the access of black students to vocational education is the location of newer and more modern facilities outside urban areas with high concentrations of non-white population. Federal assistance for vocational school construction has fostered the growth of area vocational schools operated by consortia of suburban districts. The creation of regional vocational school districts has often duplicated city/suburban attendance patterns.

The Advi ory Council on Vocational Education reported in 1968 that in the three years after the effective date of the Vocational Education Act of 1963, 45 states had funded 689 construction projects. In the years 1965 and 1966, 72 projects were identified as specialized high schools, 181 as departments of regular high schools, 113 as technical or vocational schools, and 77 as departments of postsecondary schools. A major limitation, the Council said, was "that large cities tended to be shorted in the allocation of construction funds relative to their critical need for facilities."14/ By the mid-1970's, the number of federally assisted area vocational schools had increased to more than 2,000.15/

The Office of Education reported that in the 1972-73 school year, 47% of the secondary vocational education classes were located in small cities, 22% were in rural areas, and 16% were in large cities. Of the postsecondary classes offered by secondary districts, 41% were located in small cities, 27% were located in the suburbs of large cities, and 12% were located in large cities.16/

More recently, the Massachusetts Advisory Council on Vocational-Technical Education conducted a study of minority and female access to vocational schools in the Boston and Springfield Metropolitan Areas.

14/ The Advisory Council on Vocational Education, Vocational Education: The Bridge Between Man and His Work (1968), Reprinted in Notes and Working Papers Concerning the Administration of Programs Authorized Under the Vocational Education Act of 1963, prepared for the Subcommittee on Education of the Committee on Labor and Public Welfare, U.S. Senate, p. 23, 37. The Council was appointed by HEW Secretary John Gardner in November 1966.

15/ General Accounting Office, What is the Role of Federal Assistance For Vocational Education?, p. 51 (December 31, 1974) Hereinafter referred to as GAO Report.

16/ Characteristics, Table 137, p. 182.

The Council found that 36% of all Boston and Springfield Metropolitan Area schools reflected a significant difference between the proportion of non-white students in vocational schools and the proportion of non-white students in their service area. Schools with significantly higher proportions of non-whites were located in Boston and Cambridge, while three of the eight regional vocational-technical schools had significantly lower proportions of non-white students. Urban students in the Boston area, the Council concluded, do not have equal access to newer vocational schools and more varied skills programs compared to suburban students. The municipal schools to which urban students have access are, generally, older, spend less per pupil, and offer fewer programs than regional vocational schools.17/

Public school vocational enrollment at the secondary level in central cities is largely confined to comprehensive high schools with vocational departments, although high schools specializing in vocational and technical programs do exist. The vocational courses offered in these comprehensive high schools are typically the traditional programs such as auto mechanics, home economics, cosmetology, or wood shop which produce the least saleable skills or prepare students for employment where there is the least demand. Proprietary schools offering specialized technical training are also found in large cities, but tuition costs would prohibit attendance by minority youth, a large proportion of whom are unemployed. Even if suburban vocational schools admitted

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17/ Massachusetts Advisory Council on Vocational-Technical Education, A Study of Minority Group Access to Vocational-Technical Schools in the Boston and Springfield Metropolitan Areas, p.18, 2, (May 1975). Hereinafter referred to as Massachusetts Study.

city students, the difficulty and cost of commuting effectively limits their access to high quality programs and thus to good-paying jobs.

While it is true that the enormous amounts of matching funds required for construction in cities may have deterred the building of new vocational-technical schools, financial considerations are not the only reason that minorities have been denied access to good vocational preparation. Regional vocational school districts have been created by school systems which have excluded cities and even systems with concentrations of minority students. These districts are either established pursuant to state law or approved by state education agencies which,as receipients of federal funds,are subject to Title VI.

The Office for Civil Rights uncovered an example of separate and unequal vocational schools during its 1973 review in the greater Harrisburg (Pennsylvania) area.18/ The Harrisburg-Steelton-Highspire area vocational school was established in 1967 to serve the city of Harrisburg (60% black enrollment) and the Steelton-Highspire School District (26% black). Those two school systems had the highest black proportion in the metropolitan area. In 1965 the Dauphin County area vocational school district was created to serve six school districts surrounding Harrisburg and Steelton-Highspire. The combined enrollment in these six districts was 2.5% black. The Dauphin area

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18/ LDF Report pp. 43-44.

vocational school's black enrollment reflected the proportion of black students in the sending schools. Black enrollment at the Harrisburg-Steelton-Highspire school was 5% higher than the black proportion in its sending schools.

The Dauphin school was located in one new and modern building. Harrisburg's vocational facilities were scattered throughout the city. Dauphin offered several programs which Harrisburg did not: chemical technology, scientific data processing, air conditioning and refrigeration, commercial art, textile and apparel trades, and carpenter and machinist apprenticeship classes. A state official told OCR that he suspected that the reason why Harrisburg and Steelton-Highspire were not included in the regional consortium was that white county residents did not want their children attending a school with a high black enrollment.

The federal government has undoubtably contributed to the creation of a system of separate and unequal vocational schools in America's urban districts. There exists, however, no nationally available information that this is so. Between 1965 and 1973 approximately 16% of the basic federal vocational education grants to states has been spent on school construction.19/ The Office of Education gathers figures annually on the amount of federal dollars expended for vocational school construction,20/ but it does not collect

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19/ GAO Report, p. 16.

20/ In Fiscal Year 1974, the federal government spent $19.6 million for school construction under Part B of the Vocational Education Amendments of 1968. Office of Education, Vocational and Technical Education Selected Statistical Tables, Fiscal Year 1974, Table 012, p. 10 (June 1975).

race or sex enrollment data on these federally assisted projects.21/ The Office of Education does not require state departments of vocational education to conduct an analysis of the racial impact of proposed construction or renovation so that OCR could determine whether a Title VI violation exists. Such a finding should immediately result in suspending federal money.22/

B. Segregation Within School Districts - Within a single school district, the creation of dual attendance zones, separate branches, and program differentiation has the effect of denying access to minorities and women. Although some of these practices are remnants of the de jure system of racial segregation in Southern states, there is evidence that they are a Northern phenomena as well. The 1974 OCR survey of area vocational schools in Louisiana documents that there are 15 parishes each of which is served by two or more vocational schools which still retain their racial identifiability from the days of legal segregation. Boston Trade High School has a 72.5% non-white enrollment while the Boston Technical High School is 32.8% non-white. The tenth through twelfth grade population from which these two schools

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21/ In February 1974, OCR conducted a race and sex survey of 1,507 area vocational schools, but these schools were not necessarily those constructed with federal money.

22/ Title VI regulations provide that "in determining the site or location of a facility,... a recipient may not make selections with the effect of excluding individuals from, denying them the benefit of, or subjecting them to discrimination... on the ground of race... ." 45 CFR 80.3 (b)(3).

Regulations issued pursuant to the Vocational Education Amendments of 1976 have, for the first time, required that area vocational school construction meet the non-discrimination provisions of the Title VI regulations. 45 CFR § 104.553.

draw their students is about 40% non-white.23/ Philadelphia has three area vocational schools which have service areas ranging from 33% to 65% non-white. The three schools have, respectively, a 25%, 87%, and 93% black enrollment.

An Office for Civil Rights review of the Augusta (Georgia) area vocational school found that the school had two branches, one 85% white with a nearly all-white faculty and one 70% black with a two-thirds black faculty. Five courses were duplicated at the two branches. A third branch housed health and nursing courses which were almost exclusively female.24/

The General Accounting Office found a secondary area vocational school that located all its clerical, health, and cosmetology programs in one building and all its other courses in an adjacent building. The female students interviewed by GAO said that the courses they were taking did not necessarily coincide with what they hoped to do later in life but that their training choices were limited because they were not allowed to go into the "boys" building.25/ Program differentiation between traditionally male and traditionally female courses not only creates sexually segregated schools,26/ but it also restricts the access of women to the type of training that leads to higher paying jobs.

23/ Massachusetts Study, p. 3. The Council's report does not explain why these two schools have such racially disparate enrollment.

24/ LDF Report, p. 35.

25/ GAO Report, p. 86.

26/ The 1974 OCR survey of 1,507 area vocational schools identified 28 single-sex or predominantly one-sex schools throughout the country. The survey was by no means a comprehensive one, hence the number of predominantly single-sex schools is likely to be underestimated.

Fifteen of the 17 municipal schools in the Boston area had 20% or fewer female students. One had a female enrollment in the 31-40% range. One school was 77.6% female.27/ Seven of the eight Boston area regional vocational-technical schools enrolled 30% or fewer women. The eighth school was 61% female, and 87% of its female students was enrolled in two programs - home economics and office occupations.

Of the eight Springfield, Massachusetts, area vocational schools, seven had female enrollments of less than 40%. One, the Springfield High School of Commerce, was 76.3% female because it offered typing, stenography, office practice, business management, data processing, bookkeeping, and business mathematics. Springfield Technical High School, one of the two other vocational schools serving students in the city, offered a college preparatory program and a technical program which included mechanical drawing, architectural drawing, woodworking, graphic arts, printing, auto shop and machine shop.28/

Program differentiation also occurs between majority white and majority black schools. The courses which train for higher paying jobs are offered in predominantly white schools. An Office for Civil Rights analysis of Alabama vocational schools shows that there is a correlation between the racial composition of state-operated

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27/ The Henry O. Peabody School for Girls offers fashion design, fashion merchandising, business education, cosmetology, practical nursing, and culinary arts. The culinary arts program, which had more male than female students, accounted for the 22.4% male enrollment.

28/ Male/female enrollment figures at Springfield's High School of Commerce and Technical High School by program offering were not included in the Council's report.

schools in three major cities and the presence of an air-conditioning program: 29/

Schools With an Air-Conditioning Program

School	City	% Black
S.W. State	Mobile	21%
Shelton State	Tuscaloosa	21%
Jefferson State	Birmingham	13%

Schools Without an Air-Conditioning Program

School	City	% Black
Carver State	Mobile	84%
Tuscaloosa State	Tuscaloosa	96%
Lawson State	Birmingham	99%

C. Admission Criteria - Vocational schools are often thought of as open enrollment institutions. That is far from the case, especially in the better vocational schools with the more sophisticated programs. A host of admissions criteria confronts students who seek vocational preparation. They include: (1) previous academic record, (2) school attendance records, (3) a record of suspension or other disciplinary acts, (4) I.Q. tests, (5) aptitude test performance, (6) vocational interest inventories, (7) a high school diploma or its equivalent,

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29/ Office for Civil Rights, Memorandum: AVES Survey State-Operated Schools in Alabama, p.2 (July 28, 1977). The same correlation appeared in other state-operated schools. There were 23 state-operated schools in Alabama of which 13 offered air-conditioning. Although the state operated five schools with a population in excess of 80% black, none offered air-conditioning. Conversely, there were three courses which were offered only in black majority schools. They were masonry, appliance repair, leather work (shoe repair).

(8) union apprenticeship, (9) inquiries concerning marital status, dependents, and financial support, (10) pregnancy and (11) course prerequisites. A few criteria are sometimes required for state licensure and are therefore out of the control of school officials. Some are required only for specific programs. For applicants for traditionally female courses, inquiries about their marital status, dependents, and financial support, are outright illegal under Title IX.30/ The problem with such criteria as academic, attendance, and disciplinary records, I.Q. and aptitude test scores is that they have never been validated for successful completion of vocational training. Where any of these criteria have a racially or sexually adverse impact on vocational school admissions, the result is to deny access to minorities and women.

Minority students are disproportionately suspended and expelled from school in many districts.31/ Minority students do not perform as well on standardized achievement and I.Q. tests. Not only will these criteria have a racially adverse impact, they do not necessarily predict a student's deportment in a vocational school or his or her ability to acquire skills. The very lack of motivation which is said to account for poor attendance, discipline, and achievement may be reversed by the opportunity to learn skills which will lead to gainful employment.

30/ 45 CFR § 86. (c)(1)(4).

31/ Children's Defense Fund, Children Out of School in America, (1974); Children's Defense Fund, School Suspensions: Are They Helping Children?, (1975).

The General Aptitude Test Battery (GATB), developed by the Department of Labor for use by state employment services, is one of several tests used in vocational schools. A non-governmental user of the test must sign a Release Agreement Form which includes a statement that the GATB will be used only in counseling. The counseling role of the GATB, however, precludes its use as an admission requirement, a priority assignment device for a program within a school, or as a screening device for entry into specific courses. As a tool for vocational counseling and placement, as opposed to the placement of trained applicants, the use of the GATB has been called into question:

> "USTES [United States Training and Employment Service/Department of Labor] has presented no direct evidence to indicate that individuals with high test scores on a given test can learn to do any job better than individuals with low scores. In the absence of evidence to the contrary, the GATB subtests must be interpreted as measures of current status and not ability to learn." (emphasis on the original)32/

Once students are admitted, there may be other tests and prerequisites required for course placement. Excess demand for the most popular courses may result in students being required to demonstrate particular interest and ability or to have the recommendation of a teacher or counselor.

A different kind of admissions barrier is the quota that a regional vocational school frequently assigns to the several districts which

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32/ O.K. Buros, The Seventh Mental Measurements Yearbook, Vol. II, p. 1060 (1972).

it serves. Students in each sending district are therefore competing for a finite number of spaces. When in addition they must present evidence of good scholastic attainment, exemplary deportment, and "interest", the competition becomes acute.33/ Indeed, some vocational schools are very elite institutions. School administrators have the luxury of selecting those students whom they believe, by their definition, will be successful. Minorities and females who may be perceived to have "special needs" or to be students who will not "fit in" to the school's elitist image of itself will be screened out.

D. Underrepresentation of Minorities and Women - Although women and minorities are nationally over represented in secondary vocational school enrollments compared to their proportion in the high school population,34/ they are underrepresented in some vocational schools. For example, The Pennsylvania Human Relations Commission reports that women constitute just under 50% of all pupils in grades 10 through 12 of the state's high schools but 60% of the secondary vocational programs in those schools, yet they represent only 36% of all students enrolled in the 65 area vocational technical schools.35/

33/ GAO identified a career development center in one city which rated applicants on the basis of achievement, attendance, and disciplinary records. Only 8% of the city's high school students were enrolled, yet more than 500 spaces were unfilled. GAO Report, p.86.

34/ Women constitute 49.5% of all high school students but 57% of secondary vocational school enrollment. Minorities (American Indian, Black, Oriental, and Spanish-speaking) are 14% of the total high school enrollment but constitute 23% of secondary vocational enrollments. Characteristics, pp. 8-9.

35/ Pennsylvania Human Relations Commission, Participation of Female and Black Students in Approved Vocational Education Courses and Programs in Pennsylvania, School Year 1973-74 Compared with School Year 1971-72, (June 10, 1976); Participation of Female Students in Area Vocational Technical Schools of Pennsylvania School Year 1974-75, (October 25, 1976).

Only 36% of Florida's area vocational schools' enrollment were women. The Massachusetts Advisory Council found that 13.7% of all students attending municipal vocational schools and 26.3% of all students attending regional vocational schools in the Boston metropolitan area were women. Females constituted 36.2% of all those enrolled in Springfield area vocational schools. The Council's report concludes that women were the most underrepresented group of students included in its study.36/ The Advisory Council on Vocational Education reported in the 1960's that:

> "Limited information indicates that, in large cities, a higher proportion of Negro than white youth tends to be enrolled in vocational courses, while the opposite is true elsewhere. However, given their gross underenrollment in college, the occupational training needs of Negro and other minority youth are far greater than these enrollments could meet. Although there are no hard data, experience suggests underrepresentation of Negroes in vocational courses in rural and small city schools and gross underrepresentation in postsecondary vocational education and adult extension courses."37/

More than a decade, later there are still no hard data on which an assessment may be made of how the multiple barriers effect the access of minorities and women to which kinds of schools. It is clear that governmental actions at all levels, not just societal pressures and personal choice, are responsible for erecting the barriers that have an adverse impact on the preparation of minorities and women for the labor market.

36/ Massachusetts Study, p. 2.

37/ Supra Note 14, p. 37.

II. FUND DISTRIBUTION

In 1974 the General Accounting Office reported on the basis of OE statistics that "only 51% of the federal funds used for vocational education in Fiscal Year 1973 were directed to metropolitan areas where 69% of the nation's population resided during the 1970 Census."38/ Evidence of an anti-urban bias in the distribution of federal vocational education funds is inconsistent. A Syracuse University Research Corporation study found that, except for Title I of the Elementary and Secondary Education Act, large cities were receiving less federal aid than their proportionate share of the state's population would imply. In the 50 largest cities with 21.3% of the pupil enrollment in their combined 28 states and 26.4% of the disadvantaged Title I count, their receipts of vocational education funds amounted to 15.9%. 39/ An Office of Education study, however, reports no anti-central-city bias in the distribution of federal vocational education money. 40/

Two studies of the allocation of federal and state money in Massachusetts do document discrimination against vocational schools located in cities. While only 11% of all vocational students attended regional vocational schools in the 1973-74 school year, 53% of all federal and state funds were allocated to these schools which are located primarily in suburban areas and which do not draw their students from economically depressed areas. 41/

38/ GAO Report, p.24.

39/ Joel S. Berke, et. al., Federal Aid to Public Education: Who Benefits?, p.39 (January 31, 1971).

40/ Alan Ginsburg, Patterns of Federal Aid To School Districts, p.37, (February 1975).

41/ Massachusetts Advocacy Center, Equal Opportunity Denied-Vocational Education in Massachusetts (undated); Massachusetts General Court, Joint Committee on Post Audit and Oversight, State Financial Assistance for Secondary Vocational Education, July 15, 1976.

There simply is no thorough analysis of vocational school finance, but the evidence available convinced Congress that federal vocational education funds were not concentrated where the need is the greatest, that is in poor areas with high youth unemployment. In many states, such areas are also likely to have high concentrations of blacks and other minority youth. The 1976 Vocational Education Amendments sought to redirect federal funds to the area of greatest need and required the National Institute of Education to assess the impact of this, as well as other requirements, In addition to documenting the geographic distribution of federal and state dollars within states, the question of whether there is discrimination against minorities and women in the allocation of financial resources must also be examined. Intra-state and intra-district funding patterns must be explored to find out whether suburban, predominantly white, schools spend more, about the same, or less than city schools of comparable size. Per-pupil expenditures for schools and courses which are predominantly minority or female as compared to those schools and programs which are heavily white and male should be documented. One can surmise that home economics and office occupations might cost less per pupil than machine shop and other technical programs, that masonry and food service occupations do not cost as much per-pupil as air-conditioning and aircraft mechanic programs. But where the same or very similar courses are provided for different racial and economic groups, are there disparities in expenditures? What causes them? If disparities do exist, a legal analysis is required to determine whether recipients of federal financial assistance are violating Title VI or Title IX in the dis-

tribution of vocational education funds. The responsibility of the federal government for any manifest race or sex disparities in the distribution of federal money must also be studied.

Because so little concrete information exists about whether there is discrimination against minorities and women in the distribution of federal and state vocational education funds, this paper can only suggest what the research and compliance issues are. The indirect evidence -- school location, quality of facilities, course offerings, enrollment and staffing patterns, the provision of other services to students -- leaves no doubt that there is a serious problem which awaits a thorough and comprehensive analysis.

III. WITHIN SCHOOL PATTERNS OF RACE AND SEX ENROLLMENT

Statistical documentation of minority and female participation in different vocational courses is abundant. The problem is not finding out what the facts are but rather determining what they prove with respect to Title VI and Title IX.

The most useful source of race and sex enrollment data to date is the survey of area vocational-technical schools conducted by the Office for Civil Rights in the 1973-74 school year. That survey covered every state and included a cross-section of secondary and postsecondary schools, facilities in central cities, suburbs, small towns, and rural areas, and state and locally operated institutions. It also reported minority population in the service area, the names of feeder schools, race and sex participation in apprentice programs, and the minority and female composition of instructors and administrators. Summaries of the data for five states reveal the general patterns. 42/

Connecticut

Women were only 10% of the enrollment in the 14 state-operated schools surveyed, perhaps because those schools did not offer marketing and distributive education or business and office occupations. Health programs were 97% female; home economics was 77% female (all males were in food management); cosmetology was 99.5% female; trade and technical subjects had very few women. Non-white enrollment, which was 8% overall, ranged from 2% in air-conditioning, to 8% in nursing and dental assistant, 8% in auto mechanics, and 17% in food management.

42/ These summaries came from Office for Civil Rights memoranda prepared in July 1977.

Florida

Florida's area vocational schools are a combination of secondary and postsecondary institutions both locally and state-operated. Female enrollment was more than 90% in health and office occupations and home economics; 52% in marketing (floristry was over half female), 19% in technical programs; 14% in agriculture, and 11% in trade courses. The state's minority population was reported as 15.8% and the black population as 12.2%. Yet minorities represented 22% and blacks 19% of the area vocational school enrollment. Their distribution across broad occupational categories was as follows:

office occupations -- 32% minority and 29% black;
home economics -- 23% minority and 21% black;
marketing -- 22% minority and 19% black
trade -- 18% minority and 15% black
health -- 16% minority and 14% black
agriculture -- 16% minority and 15% black
technical courses -- 12% minority and 10% black.

Massachusetts

Fourteen of the 23 regional vocational high schools responding to the survey had an enrollment that was 24% female. Business and office occupations, home economics, and health programs had enrollments that were, respectively, 80%, 88%, and 96% female. The marketing category was 44% women overall, but when food services and distributive education were subtracted, the female enrollment dropped to 3%. Technical occupations were 11% female. Trade and industrial programs were 6% female, but 60% of the women were taking commercial art, cosmetology, and quantity food preparation.

North Carolina

The area vocational schools surveyed in this state are all community colleges. Women represented 37% of the enrollment. Blacks constituted 20% of the enrollment, just slightly lower than the state's 22.2% black population. Women were 89% of the enrollment in health programs, 96% in home economics, 15% in trades, and 11% in technical courses. Forty-two percent (42%) of the students in office occupations were women, however, men were concentrated in three programs - management, accounting and data processing. Home economics had an enrollment of 32% black women. Black enrollment in trade occupations was reported at 40% black, largely because black women in cosmetology and art were included in this category.

Texas

The female enrollment in the area vocational schools surveyed was 34%, and it was concentrated in the traditional programs: health (84%), home economics (83%), and office occupations (57%). It was extremely low in trade (9%) and technical (4%) programs.

The chart below shows the distribution of the minority enrollment by occupational category:

	All Minorities	Black	Spanish
Total Enrollment	28.0%	14.0%	13.0%
Home Economics	74.0%	49.0%	25.0%
Office	37.0%	12.0%	24.0%
Trade	28.0%	9.0%	18.0%
Health	25.0%	13.0%	12.0%
Technical	21.5%	6.0%	14.7%
Marketing	20.0%	8.6%	11.0%
Agriculture	5.9%	4.0%	2.0%

The OCR analysis notes that the total minority population in Texas is 13.2% (blacks are 12.5%). Although 14% of the enrollment in the schools reporting was black, 30% of the total black enrollment was found in one Fort Worth school. Ninety-six percent (96%) of the Spanish-Surname enrollment was clustered in six schools.

* * *

The enrollment figures reported by broad occupational categories from these five selected states do not reveal the often substantial minority and female concentrations in certain courses within those categories. The patterns do confirm, however, that vocational training is perpetuating the racial and sexual stratification in the labor market. Women and minorities are underrepresented in training leading to higher paid occupations. They are overrepresented in courses leading to the less skilled and lower paying jobs. Within traditionally male and female courses, there are racial differences. In Louisiana's area vocational schools, for example, 26% of the enrollment in the health occupations category was black; but while 51% of those in nurses aid training was black, only 26% of those in training to be nurses was black.

Although the factors influencing a student's selection of vocational training are manifold, the central question is what role do school officials play. How much of the race and sex disparities is attributable to the actions of principals, teachers and counselors?

It is not always easy to ascertain the effect of counseling upon student course selection, primarily because other persons-- parents and peers-- also have an obvious influence. Nonetheless, counselors do have a considerable influence, as demonstrated by a study conducted by the Norfolk (Virginia) Public Schools and a report by the American Friends Service Committee on Title IX implementation in six Southern states.[43] Questionnaires were administered to 195 students at the Norfolk Technical-Vocational Center. Fifty-eight percent (58%) of the students surveyed felt that counselors influenced to some degree their selection of courses. Over half of the students had discussed specific courses with their counselors, with 88% of the students replying that their counselors had encouraged them to pursue the courses in which they themselves were interested. More than a third (38%) of the students said that counselors were the source of their first serious interest in attending vocational school. A questionnaire administered to senior high school guidance counselors revealed that 42% of them reported differentiating between appropriate courses for men and for women.

The Norfolk study showed that counselors had a greater influence on black than on white students. Students by each race/sex group were asked if counselors had "some influence" on their course selection. Forty-six percent (46%) of the black women and 48% of the black men said yes, while only 27% of the white women and 24% of the white men said yes. Affirmative answers to the question of whether counselors had had "no influence" on course selection were as follows: white men 62%, white women 48%, black women 25%, and black men 19%.

43/ Norfolk Public Schools, Memorandum from Director of Guidance to the Assistant Superintendent, Division of Pupil Personnel Services, (February 9, 1977); American Friends Service Committee, Almost As Fairly, pp. 23-37 (April 1977).

If black students are more heavily influenced by counselors than white students are and if black students are clustered in the programs preparing them for menial, low-paying, non-union jobs, then questions of Title VI compliance do arise. Similarly, when women face a greater burden of proof of their interest and ability in training which is non-traditional for their sex, such admissions criteria would constitute a violation of Title IX. The difficulty of documenting the actions of counselors is not to be underestimated. However, OCR has not addressed the question of whether the racially or sexually adverse impact of counselors' influence is a violation of Title VI or Title IX or whether remedial action is legally required.

IV. VOCATIONAL EDUCATION AND WORK OPPORTUNITY

Actual experience on a job during a student's career in a vocational school is an important part of his or her preparation for the labor market. Almost one quarter of all secondary vocational students participate in work-study and cooperative education programs. Are blacks and women participating in these programs in proportion to their presence in the vocational enrollment? Do they share equally with white men the opportunity to earn the equivalent wages and work in jobs related to the field in which they are enrolled? The evidence is that they do not, but more detailed documentation of this problem is needed.

The data, meager though they are, show that a higher proportion of whites than blacks are participating in cooperative education and work-study and that whites, more so than blacks, were more likely to be working in jobs that were related to their field of training in vocational schools. The picture for women is somewhat different. Approximately the same proportion of men and women are participating in cooperative education and work study, but men tend to work more hours a week and in jobs more closely related to their classroom training.44/

Job placement services are yet another service vocational schools may provide for their students. Whether job placement is done informally

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44/ Characteristics, pp.20-21; p.133, Tables 55, 55A, 55B.

by course instructors or through a structured program, the issue is whether such a service is made equally available to minorities and women. Job placement programs must be investigated and statistics gathered in order to answer this question, for no such informaion is presently collected by the states or the Office of Education.

Title VI and Title XI regulations clearly cover non-discrimination in any service such as work-study, cooperative education, and job placement provided by recipients of federal financial assistance.[45] Vocational schools must be cognizant of the equal opportunity record of employers to which they refer students. For a vocational school to say that it does business only with equal opportunity employers is not enough. It must keep records by race and sex of those students referred, those interviewed, those hired, as well as the type of job and salary obtained. Vocational schools must decline to make their facilities and services available to employers who discriminate in hiring and promotion, whether those companies are employing graduates of the school or work-study and cooperative education students.

45/ 45 CFR 80.3(b)(1)(iii); .4;.6(b); 45 CFR 86.31(b)(7): 86.38.

V. APPRENTICE PROGRAMS IN VOCATIONAL SCHOOLS

Many vocational school offer apprenticeship programs which are operated by unions or employers. The school may lease or make available classrooms and shops at no charge. In some cases, the school may even pay the apprenticeship instructor. Apprentice programs are an important part of a vocational school's program because they lead directly to well-paid, union jobs which are the bottom rung of the industrial job structure.

Apprenticeship programs in area vocational schools are overwhelmingly dominated by white males, as is demonstrated by the following statistics taken from the 1974 OCR survey:

State	% Black	% Women
Connecticut	5.0%	46/
Florida	3.0%	3.7%
Georgia	9.0%	0.0%
Massachusetts	0.6%	0.09%
North Carolina	14.0%	0.4%
Pennsylvania	12.0%47/	NA
South Carolina	22.0%	7.6%
Texas	10.5%	0.6%
Virginia	8.0%	0.7%

46/ In Connecticut there is one women apprentice, and she is an apprentice chef.

47/ Ninety-eight percent (98%) of the blacks in apprentice programs were in one Philadelphia school. Although that school had a 93% black enrollment in its vocational programs, only 23% of the apprentice classes were black.

The exclusion of blacks from unions, especially in the construction trades, is well known.[48] Only recently have women begun to enter traditionally male, blue-collar jobs in industry and construction.[49] The question for vocational schools is whether they may make their facilities available to union apprenticeship classes from which minorities and women are excluded. While schools are not responsible for the discriminatory conduct of unions or employers, they are prohibited by Title VI and Title IX from providing any service, or other benefit, in their facility that discriminates on the basis of race, or sex.[50]

The Office for Civil Rights has never issued a policy interpretation that the Title VI and Title IX regulations apply specifically to vocational schools that make their services available to unions which exclude minorities and women. Nor has OCR stated what action vocational schools must take with respect to apprenticeship classes conducted in their facility.

48/ Ray Marshall, The Negro and Organized Labor (1965); Marshall and Briggs, The Negro and Apprenticeship (1967).

49/ The Department of Labor has recently issued two proposed regulations which would require goals and timetables for employment of women by construction companies receiving federal contracts (Federal Register, August 16, 1977, pp. 41378-41383) and for affirmative action plans for registered apprentice programs (Federal Register, September 30, 1977, pp. 52441-449).

50/ 45 CFR 80.4; 45 CFR 86.31(b)(7).

VI. EMPLOYMENT

Both Title VI and Title IX cover all employees in all vocational schools receiving federal funds.[51] Forty-nine percent (49%) of all vocational education teachers in secondary school systems are women, but they are overwhelmingly concentrated in health and home economics.[52] Black teachers represent 8% of all teachers in these school systems, and 20% of them are teaching home economics.[53]

The OCR survey of area vocational schools, as well as the compliance reviews and complaint investigations it has conducted, document serious under-representation of minority teachers even in predominantly non-white schools. Women instructors are, by and large, teaching traditionally female courses. In a random sample of 400 area vocational schools, 93% of the directors were men.[54] Even when presented with substantial evidence of employment discrimination, OCR has failed to enforce Title VI.[55]

Vocational education administrators contend that black teachers are hard to find because wages in private industry are so much more attractive than the salaries that they offer. But if they can find whites to teach at those salaries, why can they not find blacks? If hiring is done locally or through state civil service systems, recruitment and hiring practices which are discriminatory must be corrected.

51/ 45 CFR 80.3(c); 45 CFR 86.51.

52/ Characteristics, p.37.

53/ Id., p.38.

54/ Pamela Ann Roby, Vocational Education and Women, p.19, (May 1975).

55/ LDF Report, pp.62-63.

Other employment practices--promotion, compensation, job classification and assignment, and fringe benefits--must also be examined for their discriminatory effects. For a field in which black students are so heavily represented, there are both legal and educational reasons why the number of black teachers and administrators should be increased dramatically. If sex stereotyping in vocational programs is to be eradicated, women must be trained and recruited to teach the traditionally male-dominated courses so that female students will be encouraged to enroll. Women have been severely disadvantaged in the award of grants under the Education Professions Development Act.56/ As single-sex schools are eliminated and racially dual ones dismantled, women and black vocational educators must not bear the brunt by being demoted.

Finally, the race and sex employment patterns of state departments of vocational education deserve special scrutiny. At present there are only two women and one black state directors of vocational education. Staffs of state departments are predominantly white male. Women professionals are almost exclusively home economics or business supervisors or the sex bias employee required by the 1976 Act.

The entire area of employment in vocational education is one where data are sorely needed and could be collected by requiring the information in the annual accountability report submitted to the Office of Education. But more important is the need for enforcement by OCR and the establishment of affirmative action requirements by OE.

56/ Supra note 52.

VII. RECOMMENDATIONS FOR RESEARCH

The National Institute of Education's mandate in the Education Amendments of 1976 is to conduct a study of vocational education, including "an examination of how to achieve compliance with, and enforcement of,the provisions of applicable laws of the United States." That study must include the two principal non-discrimination statutes, Title VI and Title IX.

There are five major research projects which are suggested by the compliance issues addressed in this paper. In each of the research areas, NIE's task is two-fold. First, it must examine governmental actions at the state and local level which affect minority and female access to and participation in vocational education and report to Congress on the extent to which state departments of vocational education and schools are complying with the requirements of Title VI and Title IX.

Second, the adequacy of federal enforcement of these non-discrimination requirements by the Office of Education and the Office for Civil Rights warrants NIE's attention. The 1976 Amendments have set in place a number of planning and accountability mechanisms which could be the vehicles by which civil rights compliance is effectuated. Title VI and Title IX carry with them a potent weapon - the threat of loosing federal funds for failure to comply. The federal government must use that sanction if the pervasive and historic race and sex discrimination in vocational education is ever to be uprooted.

1. Vocational School Finance

A comprehensive examination of vocational school finance should be a high priority. Among the questions it should explore are:

a. What are the patterns of distribution of state vocational education money relative to geographic area, level and type of training, minority population centers? Is the allocation of state funds detrimental to districts or schools whose service area is heavily minority? Analysis of state funding patterns prior to, as well as subsequent to, the 1976 Act would help assess the impact of that legislation. The extent to which federal requirements may affect the distribution of the states' own funds should be investigated.

b. What are the differences in per-pupil expenditure among schools and programs with varying racial and sexual characteristics?

c. Has the distribution of federal financial assistance by states been disadvantageous to districts or schools which have higher proportions of non-white rather than white students?

2. Vocational School Construction

What has been the federal contribution from all sources to the construction and/or renovation of area vocational schools? Such a study should answer these questions:

a. What has been the racial and geographic impact of these expenditures?

b. How many and what kinds of federally assisted projects have been located in urban, suburban, small town, and rural areas? How has the construction and/or renovation affected enrollment patterns and program quality in neighboring schools?

c. What are the factors that govern state decision making with regard to location of new schools, additions to other schools or renovation and upgrading of existing institutions?

3. Vocational School Governance Structure

Has the creation of special vocational school districts, regional consortia, or state-operated institutions had an adverse impact on minority and female access to a diversified vocational education curriculum?

a. What are the state laws, policies, and practices which govern the establishment of regional districts and state institutions?

b. Has state action resulted in the creation of separate and unequal vocational training for minorities and women?

4. Cooperative Education and Work Study

Because so little definitive evidence exists of the extent to which minorities and women participate in cooperative education and work study, data on this subject should be gathered and analyzed. The study should determine the extent of participation for each race/

sex group of students relative to the type of employment, its relevance to classroom training, the wages earned, and requirements for participation.

5. Admission Criteria

There is a need to identify the more commonly used requirements for admission to vocational schools and for placement in programs. This project should:

a. Determine how the various criteria are used and assess whether they are appropriate for their intended purposes;

b. Find out what the effect of the various criteria are on minority and female applicants for vocational training;

c. Seek out those requirements which validly predict successful completion of vocational preparation for different racial and ethnic groups and for women;

d. Examine academic and aptitude tests used by vocational schools for race and sex bias.